

Meeting Notes: Community Advisory Group - Aerojet Superfund Issues, September 20, 2005

1. Attendees

Charles Berrey (USEPA, Aerojet RPM), Alex MacDonald (Regional Water Quality Control Board), Jackie Lane (EPA), Michael Girard (Aerojet), Tricia Carter (Recorder, CH2M HILL), Paul Schubert (SCWC), Janis Heple, Larry Ladd, Vickie Lee, Rick Bettis, Mike Cataldo (Schnitzer Steel), Ali Memar (GRCA), Paul Harris (ACWS), Ken Baird (SCWC), Albert Stricker (City of Rancho Cordova), Michael Benbow (A-CWS), Jean Young (SCWA), Ed Cargile (DTSC), Penelope McDaniel (EPA), Nathan Schumacher (DTSC), John Papathakis (DTSC)

2. Approval of Meeting Minutes

No comments were received. The minutes were accepted as final.

3. Update on major milestones and deliverables produced since the May meeting for OU3 and other environmental related efforts at Aerojet.

Prior to Charles Berrey's update, several items were addressed. Charles asked for comments on the figures distributed at the last CAG meeting. It was noted that the contamination in Areas 39 and 41 were not clearly defined. In addition, Charles commented that the CAG has requested a publication in EPA's quarterly newspaper regarding the CAG, which will be added to the newspaper. Charles also asked Aerojet if they could advertise in the newspapers as part of their community involvement participation in response to the CAG's request to publish paid adds prior to a meeting. The EPA can only fund this type of publication twice a year. Janis noted that this was acceptable to her (publications twice a year). Michael Girard confirmed that he saw the advertisement for this meeting in the Sacramento Bee neighborhood section for Rancho Cordova.

Charles also introduced Penelope McDaniel to the group. Charles noted that work on this project is speeding up with the anticipated approval on the remedies, which will trigger a Proposed Plan. Presentations will be given in Rancho Cordova and Folsom (two public meetings). The next step will be a Record of Decision where all comments on the Proposed Plan will be responded to. There will also be an enforcement agreement with Aerojet and all significant CERCLA events still need to take place for OU-3. Once properties have been remediated, a program modification report will be produced to delete the properties from the National Priorities List.

Charles updated the CAG on recent OU-3 activities/deliverables. Since the last meeting, the following has been completed:

1. The Agencies comment on Aerojet's July 1, 2005 "Draft 2005-2006 General Monitoring Plan" and request the document be submitted by August 15. Aerojet submitted the Final 2005-2006 General Monitoring Plan August 30, 2005 and Agencies are reviewing. This document provides all monitoring that will be conducted this year.
2. The Agencies approve Aerojet's August 8, 2005 "Extension Request for the Short and Long-Term Water Replacement Contingency Plans" now to be submitted September 26, 2005 with the provisions that 1) the plans specify by private well any outstanding data needed and when it will be obtained, 2) water replacement for private wells within 24 hours of trigger, and 3) private well replacement planning must be part of the submitted plans vs. starting when a private well triggers.
3. The Agencies disapprove Aerojet's July 19, 2005 "Final N-nitrosodimethylamine Reformation Area 2 Treatment System Evaluation" and request the document be

resubmitted within 30 days. NDMA will be treated with UV light in Area 2. EPA asked for an evaluation.

4. The Agencies provide Aerojet a letter summarizing the agreement reached August 31, 2005 "Agreement for Shallow Aquifer Response Action in Area 3." As part of Area 3 final design, Layer A/B extraction is to occur near A3-C1 as part of the current planned total 3,100 gpm Area 3 extraction. Two Layer A/B monitoring wells will also be installed near A3-C2 and A3-C3 to gage the width of the Layer A/B perchlorate contamination see attached Figure 1. If perchlorate is found above 6 ppb in one or both of the new monitoring wells, the need for additional remedial action will be evaluated.

Charles noted that the contamination in the A/B layer is from perchlorate/fertilizer and will be remediated. Mike Girard noted that Aerojet agreed to conduct this remediation. A plan is in place to remediate deeper layers.

5. The Agencies agreed to Aerojet's August 16, 2005 request for an extension to December 9, 2005 for submission of the Pre-final/Final Design for Area 1 provided Layer D west of Zinfandel Drive is protected, 2) Chettenham operated for toe of plume control and Aerojet provided early Area 1 effectiveness evaluation by 10/31/05. The County recently agreed to lease this location.

Other Area 1 items: 1) The permanent treatment plant location site lease (former USAF Mather Field) was approved by the County Board of Supervisors last week and the new Layer D monitoring wells 30290 and 30293 were non-detect for perchlorate.

Charles summarized other Aerojet Environmental Efforts:

6. The Agencies approve Aerojet's June 17, 2005 "Final Remedial Investigation/Feasibility Study Work Plan – Source Area Operable Units" with comments to be incorporated as revision inserts to the document. September 1, 2005, Aerojet submitted the revisions and Agencies are reviewing. An agreement was reached to divide the site into more OUs (6, 7, 8, and 9).
7. The Agencies provide comments on the dates indicated, excluding DTSC Risk Assessor comments, on Aerojet's June 1, 2005 "Aerojet Landfill Site Remedial Investigation/Feasibility Study Work Plan." Agencies will require a risk assessment be performed after the landfill has been removed.
8. The Agencies provide comments excluding DTSC Risk Assessor comments on Aerojet's June 27, 2005 "Field Sampling Plan for Validation of the Johnson and Ettinger Model." The Agencies requested the Field Sampling Plan is to be resubmitted within 30 days of DTSC comments. August 18, 2005, Aerojet provided "Response to comments on the Field Sampling Plan for Validation of the Johnson and Ettinger Model" with the provision that the final document will be submitted 30 days after the Agencies approve Aerojet's responses to comments. The Agencies are reviewing the response.
9. The Agencies requested that an Addendum be submitted to the Sacramento Regional Transit District's July 22, 2005 "West Access Road Final Investigation Report." The requested addendum was provided August 3 and approved August 4, 2005.
10. The Agencies provided comments on Aerojet's updated July 7, 2005 "Standard Operation Procedures for the Aerojet Site" and requested revised inserts be provided.

11. Aerojet provided “Preliminary Response to Agency comments, February 2005 Final Perimeter Groundwater Operable Unit Remedial Investigation/Feasibility Study” in response to the Agencies’ comments of April 14, 2005. The Agencies’ response is pending.
12. The Agencies requested the conflict between Table 1 and Figure 1 of Aerojet’s updated July 8, 2005 “Response to Agency comments on the 2005-2006 Exhibit IV Monitoring Plan” be provided within 30 days.
13. The Agencies disapproved Aerojet’s July 22, 2005 “Work Plan to Determine Background Metals in Surface Soil” and requested the document be resubmitted in 30 days. The document was submitted September 04, 2005 and the Agencies are reviewing.
14. The Agencies comment on Aerojet’s July 13, 2005 “Draft Closure Modification Plan, Aerojet Landfill, Waste Management Units 1, 2, 3, and 4” for incorporation in the next submission.
15. The Agencies approve the USAF “Final Removal Action Report Former Air Force Plant 70 at Building 20-009” (Polychlorinated biphenyls). Aerojet retains the obligation to implement Asphalt Cap Inspection and Maintenance Plan” and deed restrictions.
16. The Environmental Protection Agency designated Penelope McDaniel as its new Partial Consent Decree Coordinator.
17. The Agencies approved with comments Aerojet’s August 16, 2005 “Transmittal of Preliminary Risk Assessment Figures for the Perimeter Groundwater Operable Unit.”

4. Update on Well Installation Activities in OU-3 and Beyond.

Alex MacDonald provided an update on the latest activities. Alex distributed a figure depicting the areas on and around Aerojet and the IRCTS. The following locations were addressed/discussed:

Proposed GET L1/L – This is the Haggin Park area where efforts have been taken to control the NDMA plume north of the American River. Two systems are in place; however, it is difficult to extend the pipeline to both systems. Discharge is directed to the American River. These areas are currently going through the CEQA process.

NEW EXW – A test well will be installed to determine the volume of water yielded in order to size the treatment plant. Vickie Lee asked if the extracted water maintains its groundwater status. Alex responded that “whoever puts the groundwater in can take it out”. If someone else attempts to do this, they will have to appropriate the water.

GET K/New GET K – Once the construction for the Area 3 treatment system is complete, the extracted water will be transferred to the new GET K. The new monitoring wells in this area will address the C/D zones.

GET H/New GET H – GET H is the Kaiser treatment plant. The County approved the new GET H system to handle water from Area 2 and the EX-5 GET (Mather Field).

EX-25 GET – The County approved of the discharge into Morrison Creek. This GET will treat TCE and perchlorate contamination. Extraction wells will be installed between EX-25 GET and the Admin GET. The NEW MW will be installed to define the plume extending from White Rock Dump.

Teichert – An existing air stripping system is located in this area. The NEW MWs will be installed as part of the GET B facility to monitor the plume as it migrates down towards Teichert. New soil gas monitoring wells (a total of 14) will also be installed to update the model.

GET B – GET B is on the Aerojet property. Five NEW MWs will be installed to determine the extent of the plume in the D zone as part of the Perimeter Groundwater OU.

GET A and B – Area 40 is between these two GETs. Zero-valent iron wall and phytoremediation studies are currently underway.

5. Class III Permit Modification.

John Papathakis noted that the permitting and corrective action branch has allowed the Aerojet facility to treat and store hazardous waste at the site since 1997. A number of modifications have been made to this permit since 1987 (i.e. removal of a parcel of land from facility and carve out areas that were under the permit, but have since been removed). Currently, 6 acres will be removed from the Aerojet facility and will become a part of Schnitzer Steel. Schnitzer Steel currently owns the property, but the land is still considered Aerojet property. The property has shallow lead contamination ranging from 300-4,000 ppm. The Sacramento County Environmental Management Department noted that cleanup to 400ppm would satisfy the cleanup goal for industrial use. Three hundred thirty tons of soil have been removed and have met the cleanup goals based on confirmation sampling results. To prevent further risk, asphalt will be placed over the area (there is some asphalt covering the area now). This will allow the parcel to be removed from Aerojet.

Janis asked if this 6-acre parcel will be removed from RCRA action. John answered that it is still under Superfund site investigation until the EPA determines what to do. The land is being removed from RCRA, not CERCLA. Charles noted that this is land that Aerojet said was contaminated but wasn't considered carve out because of this contamination. This land will be removed from Superfund through a deletion process, and a RCRA corrective action will not take place on the property.

John noted that DTSC is in the process of a permit modification because of Aerojet's request to remove the parcel. The Class III facility has to go through a 45-day public comment period (expected to end October 17, 2005). Aerojet conducted a public meeting and DTSC is now in public comment. Aerojet is also conducting a 60-day comment period as part of the Class III permit modification request.

Ed Cargile announced that there is a plan to go public with a interim Remedial Action Plan for the IRCTS on October 1st. There will be a 5-well pump and treat system to address three plumes at Douglas Road (EX-25 GET is built and 5 extraction wells are in place, but the pipeline needs to be installed in the ground). A public meeting is scheduled for October 11th. Vickie asked what kind of analysis is conducted to ensure vernal pools are not impacted. Ed replied that Fish and Wildlife Services were involved to determine if mitigations are sufficient. Jean asked what happens to the Admin GET. John noted that the EX-25 GET will be sufficient. Ed also noted that the RI/FS for the Mather area will be re-evaluated.

6. Development and Construction within Rancho Cordova and Surrounding Areas.

Albert Stricker addressed the transportation Master Plan and the Rancho Cordova parkway interchange. Albert noted the traffic challenges in the area and the process of projecting the development in the area based on the existing and proposed land uses and population. These aspects need to be taken into consideration to improve existing roads and new roads. The main focus is the Rancho Cordova Parkway. Sunrise is the primary access point to Highway 50 which has become heavily impacted. Additional access to Highway 50 needs to be developed to relieve the burden. Albert reviewed four conceptual alternatives.

Several questions were asked from the group regarding the plan for bike paths, how to address truck traffic, sound walls, and other options/alternatives for improving access. Charles asked when the

alternate route will be installed. Albert noted that construction is scheduled for 2008. In addition, the city is looking at improving other intersections. The SACOG long term plan will also address Rancho Cordova's diversion of traffic.

7. Next Meeting.

Next meeting: Tuesday, November 15, 2005, Sheriff's substation, Community Room, 10361 Rockingham Way (just off Mather), Rancho Cordova, 7 p.m. to 9 p.m.